From: Bruce Zimet

To: Jesse C. Dresser; DerOvanesian, Jacqueline (CRM); Pogozelski, Alexander (USAFLS)
Cc: William Barzee; Ivlis Mantilla; jessica Cadwell (jessica@iclsi.com); Bruce Zimet

Subject: [EXTERNAL] US v. Boyds

Date: Monday, July 21, 2025 5:38:44 PM

Hi Jesse,

Included in this email is Alex Pogozelski, the prosecutor in the Boyds' criminal case. I informed Alex that I would introduce the two of you so you could work out logistics concerning communications and potential subpoena involving attorneys at your firm.

The Boyds have not claimed privileges on 850,000 pages of documents produced by the Government that had been seized by Gilead at Safe Chain and then produced to the Government. Included in the 850,000 pages of documents are communications between attorneys at your law firm and Safe Chain owners and employees. Since the Boyds have not claimed privileges as to the 850,000 pages of documents we anticipate that the Government will approach you and members of your law firm for the purpose of interviewing you and serving you with trial subpoena. The Boyds have not waived any privileges, but recognize that by not asserting privileges as to the 850,000 pages of documents, the Boyds can not now claim privileges as to those documents. The Boyds also recognize that they have no basis to object to Government issuing trial subpoena, but will have the opportunity to object to the scope of any subpoena, if appropriate.

Alex and myself agree that we want all parties to be on the same page concerning the process to avoid any unnecessary issues. Hopefully, this email will assist and establish open lines of communication.

BAZ

Bruce A. Zimet, Esq. 1555 Palm Beach Lakes Blvd. Suite 1400 West Palm Beach, FL 33401 (561) 508-7741 Telephone (Palm Beach) (954) 764-7081 Telephone (Broward) (954) 760-4421 Facsimile

## CONFIDENTIALITY NOTICE

This message is being sent by or on behalf of a lawyer. It is intended exclusively for, or for the use of, the individual or entity to who/which it is addressed. This communication may contain information that is proprietary, privileged, work-product, confidential, or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy, distribute, disclose or disseminate this message, in whole or in part. If you have received this communication in error, please notify the sender immediately by email and delete all copies of this message.